

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Ubong Christopher Ubokudom

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

The Blackstone Group Inc.

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. \_\_\_\_\_  
*(to be filled in by the Clerk's Office)*

Jury Trial: ☒ Yes ☐ No  
*(check one)*

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**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Ubong Christopher Ubokudom</u>
Street Address	<u>652 Bush River Road, STE 217 PMB 419</u>
City and County	<u>Columbia, Richland</u>
State and Zip Code	<u>South Carolina , 29210</u>
Telephone Number	<u>248-952-7833</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>The Blackstone Group Inc.</u>
Job or Title (if known)	<u></u>
Street Address	<u>28 Liberty St.</u>
City and County	<u>New York, Manhattan</u>
State and Zip Code	<u>New York, 10005</u>
Telephone Number	<u></u>

**Defendant No. 2**

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

**Defendant No. 3**

Name	<u></u>
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Job or Title \_\_\_\_\_  
(if known)  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known)  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

- 1 List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, (name) Ubong Christopher Ubokudom, is a citizen of the State of (name) South Carolina.

## b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) The Blackstone Group Inc., is incorporated under the laws of the State of (name) New York, and has its principal place of business in the State of (name) New York. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

The Blackstone group Inc. has caused significant damage to my physical health, emotional health, and my image.

This has lead to the loss of wages and personal as well as corporate networking opportunities.

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please see attached page.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Please see attached page.

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3/24, 2025.

Signature of Plaintiff

Printed Name of Plaintiff



Ubong Christopher UboKudom

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

### III. Statement of claims:

1. Since the plaintiff completed his emergency medicine residency training program in the month of June of 2019, the contract management group, Team health, owned by the Blackstone Group Inc. has utilized its resources to restrict the plaintiff's emergency medicine employment opportunities by bribing companies.
2. The Blackstone Group Inc. fraudulently stated that the plaintiff worked for Team Health without his knowledge.
3. The Blackstone Group Inc. has intimidated attorneys when the plaintiff attempted to seek legal counsel. This obstruction prevented the plaintiff from being able to protect his image and prevent them from restricting his employment opportunities.
4. The Blackstone Group Inc. has extorted several companies to prevent the plaintiff from pursuing several emergency medicine employment opportunities.
5. The Blackstone Group Inc. has intimidated several people and companies to dissuade them from working with the plaintiff. This has led to a loss of wages for the plaintiff.
6. The Blackstone Group Inc. has collaborated with other companies to encourage grocery stores to deviate from their normal standard customer service practices. The Blackstone Group Inc. in collaboration with other companies have encouraged several grocery stores to intentionally place toxic foods, drinks, and other products on the shelves to limit the plaintiff's ability to purchase unadulterated items. These companies violated their duty to protect the plaintiff from harm, which was intentional. This negligence continues to result in physical and emotional damage to the plaintiff.
7. The Blackstone Group Inc. in collaboration with other companies continue to place drugs in some of the foods, drinks, and other products that are sold at the grocery stores that the plaintiff attempts to purchase food at.
8. The Blackstone Group Inc. has collaborated with other companies to distribute false claims about the plaintiff, which has negatively impacted his employment opportunities. This defamation has caused a loss of wages. This defamation continues to cause the plaintiff a great deal of physical, mental, and emotional distress.
9. The Blackstone Group Inc. in collaboration with other companies continue to utilize technology to illegally monitor his electronic devices, which include his laptop and cell phone.
10. The Blackstone Group Inc. in collaboration with other companies continue to utilize technology to monitor his location.

### IV. Relief

I believe, because of the above information, that I, the plaintiff, am entitled to and do request a judgment for **\$ 5,000,000,000** and relief as below requested:  
an injunction to immediately stop the conduct that is causing harm and any costs resulting in this action. I believe this judgement will help to deter corporations in the future from recklessly destroying the lives of individuals, families, and communities.